

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

CHARLOTTE BRENT-BELL)	
)	
Plaintiff,)	Case No. 17 C 1099
)	
v.)	Judge Gottschall
)	Magistrate Judge Gilbert
THE CITY OF CHICAGO, et al.,)	
)	
Defendants)	JURY TRIAL DEMANDED

JOINT MOTION TO EXTEND DISCOVERY DEADLINES

Plaintiff, Charlotte Brent-Bell, by her attorneys, and Defendants the City of Chicago, Joseph Struck, Pamela Childs-Laughlin, Sherry Kotlarz, Joseph Lopez, Cynthia Nicholas, Louis Boone, and Audie Manaois, by their attorneys, respectfully request that this Court grant them a 2 month extension of the discovery deadlines in this case, or until November 16, 2018 to complete fact discovery, stating in support as follows:

1. Fact discovery in this matter is set to close by September 17, 2018. Dkt. 87. The parties in this case have continued to work diligently and cooperatively on discovery matters, but there are certain discovery matters that require additional time.

2. Although the parties have scheduled and confirmed some third party witnesses, including Plaintiff's damages witnesses, those depositions have been scheduled for late-September (after the current discovery cut-off) due to both counsel's and the witnesses' schedules. The parties anticipate working through the remaining discovery issues and scheduling additional third party witnesses, including treaters, within the month of October.

3. In addition, Plaintiff's motion to compel complaint register files from the City of Chicago remains pending, Dkt. 101, which may require follow-up discovery relating the production of those files.

4. The discovery that remains to be completed in this case is necessary and not cumulative of issues already completed, and thus good cause exists to extend the discovery deadlines. *See* Fed. R. Evid. 26. No party will be prejudice by the extension and jointly agree to the relief sought in this motion.

WHEREFORE, the parties respectfully request that this Court grant them a 2 month extension of the discovery deadlines in this case, or until November 16, 2018 to complete fact discovery.

Dated: September 14, 2018

Respectfully Submitted,

/s/ Julie M. Goodwin
One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

I, Julie Goodwin, an attorney, hereby certify that I served the foregoing Joint Motion To Extend Discovery Deadlines on all counsel of record via the Court's CM / ECF filing system on September 14, 2018.

/s/ Julie M. Goodwin